UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF OHIO COLUMBUS DIVISION

DIANE OWENS, Individually and on Behalf of All Others Similarly Situated,

No. 2:20-cv-03785

Plaintiff,

Hon. Algenon L. Marbley

CLASS ACTION

vs.

FIRSTENERGY CORP., CHARLES E. JONES, JAMES F. PEARSON, STEVEN E. STRAH and K. JON TAYLOR,

Defendants.

CHANA FRAND, Individually and on Behalf of All Others Similarly Situated,

No. 2:20-cy-04287

Hon. James L. Graham

Plaintiff,

CLASS ACTION

vs.

FIRSTENERGY CORP., CHARLES E. JONES, JAMES F. PEARSON, STEVEN E. STRAH and K. JON TAYLOR.

Defendants.

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, the concurrently filed Declaration of Victoria L. Ferrise, Esq., the pleadings and other filings herein, and such other written or oral argument as may be permitted by the Court, proposed Lead Plaintiff Movant, The City of Philadelphia Board of Pensions and Retirement ("Movant"), hereby moves this Court, before the Honorable Algenon L. Marbley, United States District Court, Southern District of Ohio, 85 Marconi Boulevard, Room 323, Columbus, Ohio 43215, pursuant to Section

21D(a)(3)(B) of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995, for the entry of an Order: (i) consolidating the actions; (ii) appointing Movant as Lead Plaintiff; (iii) approving Movant's selection of Berger Montague PC as Lead Counsel and Brennan, Manna & Diamond, LLC as Liaison Counsel for the Class; and (iv) granting such other and further relief as the Court may deem just and proper.

Dated: September 28, 2020 Respectfully submitted,

/s/ Victoria L. Serrani Ferrise

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Attorneys for Lead Plaintiff Movant the City of Philadelphia Board of Pensions and Retirement and Proposed Lead Counsel for the Class

CERTIFICATE OF SERVICE

I hereby certify that on September 28, 2020, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/Victoria L. Serrani Ferrise

Attorneys for Lead Plaintiff Movant the City of Philadelphia Board of Pensions and Retirement and Proposed Lead Counsel for the Class